

Jaan Rannik

From: Jaan Rannik
Sent: Friday, July 21, 2023 16:10
To: clement@wglfirm.com; Thomas P. Gressette, Jr.
Cc: Clinton T. Magill; Andrew K. Epting
Subject: Motion to Seal

Jim and Tom,

Saw you filed for summary judgment and moved to seal an exhibit that was marked confidential. Under the confidentiality order and the local rules, there is a duty to consult prior to filing that motion to determine whether there is a less restrictive measure available rather than filing under seal.

This was the type of meet and consult Drew sought to engage in, offering to make everything available to you, have you identify what you are interested in, and thus narrowing the scope of what might be in dispute and mark as little as possible. He followed up with a letter and a voicemail to Jim midweek. We didn't hear back, and the next thing we heard was the filing of this motion.

We could have likely resolved this without the need for a motion to seal had we been consulted on this confidentiality question. We invite that consultation and ask you withdraw the motion to allow for the process provided for in the Confidentiality Order and the Local Rules.

Jaan

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Typos courtesy of my SmartPhone.